

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: CAPITAL ONE CONSUMER)	
DATA SECURITY BREACH LITIGATION)	MDL No. 1:19md2915 (AJT/JFA)
_____)	

This Document Relates to CONSUMER Cases

**CAPITAL ONE’S NON-CONFIDENTIAL MOTION TO FILE
CERTAIN EXHIBITS AND INFORMATION UNDER SEAL**

Defendants, Capital One Financial Corporation, Capital One Bank (USA), N.A., and Capital One, N.A. (collectively, “Capital One”), by counsel and pursuant to Local Civil Rule 5 of Local Rules for the United States District Court for the Eastern District of Virginia, submit this Motion to File Certain Exhibits and Information Under Seal (“Motion to Seal”) filed in conjunction with Capital One’s Supplemental Brief Regarding Plaintiffs’ Standing to Assert Breach of Contract and Unjust Enrichment Claims (“Memorandum”). [Dkt. No. 1780]. Capital One moves to seal certain exhibits attached to the Memorandum, as well as portions of the Memorandum itself, which cite and incorporate information from other parts of the record that have been sealed by the Court. All of the identified exhibits were produced in discovery and designated as “Confidential” or “Confidential – Outside Counsel Only” pursuant to the Amended Stipulated Protective Order [Dkt. No. 368]. The reasons in support of the Motion to Seal are set forth in the accompany memorandum. A proposed order is attached hereto.

WHEREFORE, Capital One respectfully requests that the Court: (1) grant this Motion to Seal; and (2) grant it any such further relief that the Court deems proper.

Respectfully submitted this 30th day of July, 2021.

/s/ S. Mohsin Reza

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CERTIFICATE OF SERVICE

I hereby certify that on 30th day of July, 2021, I caused the foregoing document to be filed with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ S. Mohsin Reza
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